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Attorneys for Defendants
F5 NETWORKS, INC., NGINX, INC. (BVI)
and NGINX SOFTWARE, INC.

(Additional Parties and Counsel Listed on Signature Pages)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LYNWOOD INVESTMENTS CY LIMITED,

Plaintiff,

vs.

MAXIM KONOVALOV, IGOR SYSOEV,
ANDREY ALEXEEV, MAXIM DOUNIN,
GLEB SMIRNOFF, ANGUS ROBERTSON,
NGINX, INC. (BVI), NGINX SOFTWARE,
INC., NGINX, INC. (DE), BV NGINX, LLC,
RUNA CAPITAL, INC., EVENTURE CAPITAL
PARTNERS II LLC and F5 NETWORKS, INC.,

Defendants.

No. 20-cv-03778-MMC

**STIPULATION TO EXTEND
BRIEFING SCHEDULE FOR
DEFENDANTS' MOTIONS FOR
ATTORNEY'S FEES PURSUANT
TO 17 U.S.C. § 505; and
~~PROPOSED~~ ORDER**

Judge: The Honorable Maxine M.
Chesney

Current Due Date: Sept. 23, 2022

New Proposed Date: Sept. 30, 2022

Pursuant to Civil Local Rules 6-2, 7-12, and 54-5, Plaintiff Lynwood Investments CY Limited (“Plaintiff”) and Defendants F5, Inc., NGINX Software Inc., and NGINX, Inc. (BVI); Defendants Maxim Konovalov, Igor Sysoev, Maxim Dounin, Andrey Alexeev, Gleb Smirnov, and Angus Robertson; Defendants Eventure Capital Partners II LLC and BV NGINX, LLC; and Defendant Runa Capital, Inc. (collectively, “Defendants”) stipulate to an extended briefing schedule in connection with any motions for an award of attorney’s fees and costs brought by Defendants pursuant to 17 U.S.C. § 505 and Local Rule 54-5;

WHEREAS, the Court granted Defendants’ Consolidated Motion to Dismiss Plaintiff’s Amended Complaint (ECF 144) and dismissed Plaintiff’s First, Second, Fourth, Seventh, Eighth, Ninth, Twelfth, Thirteenth, and Fourteenth Claims, including Plaintiff’s claim for direct copyright infringement, with prejudice (ECF 162);

WHEREAS, by stipulation of the parties, Plaintiff’s remaining claims were dismissed with prejudice and judgment was entered on September 9, 2022 (ECF 166, 168);

WHEREAS, pursuant to 17 U.S.C. § 505 and Local Rule 54-5, Defendants intend to move for an award of attorney’s fees and costs incurred in defending against Plaintiff’s claim of direct copyright infringement and related claims that were dismissed by the Court’s order ECF 162 (“Motions for Fees”);

WHEREAS, Defendants requested a one-week extension to prepare and file motions and submit papers that are not duplicative of one another’s and that will streamline the issues for the Court’s consideration;

WHEREAS, Plaintiff requested two additional weeks to prepare opposition papers to address what the parties anticipate will be multiple fee requests, and Defendants requested an additional week to coordinate or streamline their replies;

WHEREAS, there have been three other extensions granted in this case (ECF 29, 68, and 143) and no prior extension regarding any motion for an award of attorney’s fees and costs; and

WHEREAS, the requested time modification would have no other effect on the schedule for the case, as judgment has already been entered (ECF 168);

NOW THEREFORE, pursuant to Civil Local Rule 6-2, it is stipulated and agreed between

Plaintiff and Defendants, through their undersigned counsel, as follows:

1. The time within which Defendants may file their Motions for Fees is extended to September 30, 2022;

2. The deadline for Plaintiff to file any opposition to the Motions for Fees is extended to October 28, 2022;

3. The deadline for Defendants to file any replies in support of their Motions for Fees is extended to November 11, 2022.

This stipulation is without prejudice to the right of any party to seek a further adjustment to the opposition date based on future or unforeseen developments.

IT IS SO STIPULATED.

Dated: September 21, 2022

MORRISON & FOERSTER LLP

By: /s/ Michael A. Jacobs

Michael A. Jacobs

Attorneys for Defendants
F5 INC., NGINX, INC. (BVI),
and NGINX SOFTWARE, INC.

Dated: September 21, 2022

KING & SPALDING LLP

By: /s/ Bruce W. Baber

Bruce W. Baber

Attorneys for Defendants
MAXIM KONOVALOV, IGOR SYSOEV
ANDREY ALEXEEV, MAXIN DOUNIN
GLEB SMIRNOFF and ANGUS ROBERTSON

1 Dated: September 21, 2022 COOLEY LLP

2
3 By: /s/ Patrick P. Gunn

4 Patrick P. Gunn

5 Attorneys for Defendants
6 BV NGINX, LLC and E. VENTURES CAPITAL
PARTNERS II, LLC

7 Dated: September 21, 2022 WILLKIE FARR & GALLAGHER LLP

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9 By: /s/ Benedict Y. Hur

10 Benedict Y. Hur

11 Attorneys for Defendant
12 RUNA CAPITAL, INC.

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14 Dated: September 21, 2022 MEISTER SEELIG & FEIN LLP

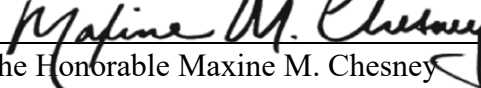
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16 By: /s/ Christopher J. Major

17 Christopher J. Major

18 Attorneys for Plaintiff
19 LYNWOOD INVESTMENTS CY LIMITED

20
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22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: September 22, 2022

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25 By: 
26 The Honorable Maxine M. Chesney
27 United States District Judge
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ECF ATTESTATION

I, Michael A. Jacobs, hereby attest pursuant to Local Rule 5-1(i)(3) that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 21, 2022

By: /s/ Michael A. Jacobs

Michael A. Jacobs